

# EXHIBIT 6

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April 18, 2022

**Via Electronic Mail Only**

Attn: Hon. Shira A. Scheindlin, Arbitrator

Email: sscheindlin@stroock.com

Re: *Juan Lopez v. Thermo Tech Mechanical, Inc. et al.*  
Case No. 01-21-0004-9203

Dear Arbitrator Scheindlin:

We are counsel to Claimant Lopez ("Claimant") in the above-referenced matter. At the April 5, 2022 conference Claimant informed Your Honor of a discovery dispute arising from Respondents' failure to provide necessary documents regarding Claimant's wage records. You Ordered that by April 15, 2022, Respondents must: (1) respond to Claimant's deficiency letter, served on Respondents on March 21, 2022; and (2) supplement their production with Claimant's wage records and documentation related to the public works contracts. To date, despite Your Order, Respondents have not responded to Claimant's deficiency letter, nor supplemented their production.

Following the April 5, 2022 conference, Claimant provided the Arbitrator with a copy of the March 21, 2022, deficiency letter served on Respondents. *See Exhibit A.* In this letter, Claimant informed Respondents that, among other deficiencies, Respondents' production was missing large amounts of Claimant's timesheets and wage statements, contained none of the contracts related to the public works projects on which Claimant worked during his employment with Respondents, and included no e-discovery. You Ordered Respondents to supplement this production with the above-mentioned information by April 15, 2022, which Respondents have not done.

This is not the first time that Respondents disregarded an Order issued by You. On January 25, 2022, Claimant required Your assistance in obtaining deposition dates from Respondents, in compliance with Order No. 1, dated November 16, 2021, due to Respondents' blatant unresponsiveness to Claimant's numerous requests to set deposition dates. Following this You issued Order No. 2, dated January 27, 2022, Ordering Respondents to provide deposition dates. *See Exhibit B.* Respondents also disregarded Order No. 2, and Your assistance was again required on January 31, 2022 for Respondents to finally provide deposition dates. *See Exhibit C.*

In light of the Respondents' dilatory tactics and blatant disregard for Your Orders, Counsel for Claimant requests that Respondents be sanctioned, as Your Honor sees fit for their conduct and disregard of the Arbitrator's Order provided at the April 5, 2022 conference.

We thank the Arbitrator for your time and attention.

Respectfully submitted,

/s/ James Jackson  
James Jackson, Esq.

Counsel for Claimant